



U.S. Department of Justice

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March 23, 2015

Honorable Peter J. Messitte, Senior District Judge
United States District Court for the District of Maryland
6500 Cherrywood Lane, Suite 475A
Greenbelt, Maryland 20770

Re: United States of America v. Silviu Ziscovici, M.D., a/k/a "Dr. Z"
Criminal No. PJM-14-0362

Dear Judge Messitte:

The Court has requested counsel to provide a written status report in this matter.

In accordance with the Speedy Trial Act, 18 U.S.C. § 3161(c), the trial of a defendant charged in an information or indictment must commence within seventy days from the filing date of the information or indictment, or from the date the defendant appeared before a judicial officer, whichever date last occurs.

On September 8, 2014, the Defendant filed a motion to suppress evidence, thereby tolling the Speedy Trial Act in accordance with 18 U.S.C. § 3161(h)(1)(D). *See* ECF No. 23.

In this extremely complicated and fact-intensive matter, the Government has provided a large volume of discovery material to the Defendant.

On February 13, 2015, prior defense counsel filed a Motion to Strike, requesting that the Court terminate the previously-assigned counsel from the Federal Public Defender's Office and assign new counsel. *See* ECF No. 29. On February 13, 2015, the Court granted the motion and, on March 16, 2015, new counsel was assigned. *See* ECF No. 30, 33, and 34. Since that time, the parties have been in communication and agree that additional time is necessary for new defense counsel to complete a review of the large volume of discovery, to conduct plea negotiations, and to assess when the parties will be prepared to proceed to motions and trial (if necessary).

Therefore, the parties jointly request that the Court grant an additional continuance through April 23, 2015, pursuant to 18 U.S.C. § 3161(h)(7), and also set a status hearing for on

or about that same date. At that time, both parties anticipate requesting that the Court set a firm trial date, likely sometime after January 2016.

The Defendant, by and through his counsel, Anthony Herman and Brett Clarence Reynolds, joins in this this request.

Very truly yours,

Rod J. Rosenstein
United States Attorney
District of Maryland

By:_____/s/_____
Arun G. Rao
Daniel C. Gardner
Assistant United States Attorneys
United States Attorney's Office
District of Maryland

By:_____/s/_____
Anthony Herman, Esq.
Brett Clarence Reynolds, Esq.
Covington & Burling LLP
Counsel for the Defendant, Silviu Ziscovici, M.D.